

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:20-cr-00054

NEDELTCCHO VLADIMIROV

FOURTH SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA  
TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND  
REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Order and Standard Discovery Request entered by the Court in this case on March 16, 2020, and March 4, 2021, the United States of America, by counsel, herewith responds to each of defendant's Standard Discovery Requests as follows:

**Third Supplemental Response:**

In this case, the United States provides expansive discovery, which has been made available to defense counsel by disc on March 4, 2021, and by email on March 16, 2021. The United States hereby incorporates by reference its prior discovery responses on March 30, 2020 (ECF 34), May 20, 2020 (ECF 38), August 24, 2020 (ECF 48), March 18, 2021 (ECF 70), and further supplements its responses as follows:

**Request E: Permit the defendant to inspect and to copy or photograph books, papers, documents, data, photographs, tangible**

objects, building or places, or copies or portions of any of those items, if the item is within the government's possession, custody or control, and (i) the item is material to preparing the defense; (ii) the government intends to use the item in its case-in-chief at trial; or (iii) the item was obtained from or belongs to defendant. [Fed. R. Crim. P. 16(a)(1)(E)]

**Response:** The United States has disclosed the following items:

1. Curriculum vitae of Nick Niehaus, Market Investigator for Target Corporation;
2. Investigative Report received from Nicholas Niehaus;
3. Curriculum vitae of Herbert Shelton, Organized Retail Crim Investigator for the Kroger Company;
4. Defendant's Jail Communications;
5. Video provided by South Charleston Police Department of interview of John Marcus; and
6. Memoranda of Interviews conducted by Anthony Hussion, Intelligence Research Specialist, United States Attorney's Office, SDWV.

REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY

Pursuant to Rules 16.1(b) and 16.1(d) of the Local Rules of Criminal Procedure, the United States of America requests that defendant provide all applicable reciprocal discovery within 14 days of the service of this response and the provision of materials requested by defendant in the Standard Discovery Request.

Respectfully submitted,

UNITED STATES OF AMERICA

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Acting United States Attorney

s/Andrew J. Tessman  
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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "FOURTH SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, AND REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY," has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 30th day of **April, 2021** to:

Timothy J. LaFon  
CICCARELLO DELGIUDICE & LAFON  
Suite 100  
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Charleston, WV 25301-2912

By: s/ Andrew J. Tessman